



KEVIN G. WALSH
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VIA ELECTRONIC FILING

Honorable Jerome B. Simandle, U.S.D.J.
United States District Court
for the District of New Jersey
Mitchell H. Cohen, U.S Courthouse, Room 6010
John F. Gerry Plaza
Camden, New Jersey 08101

Re: United States v. Albert Gonzalez, Cr. No. 09-626 (JBS)

Dear Judge Simandle:

This firm represents Company A, the victim described on pages 3 and 4 of the Indictment in the above-referenced criminal case. I have reviewed this Court's Order for Discovery and Inspection dated October 13, 2009, and have engaged in a series of communications with the U.S. Attorney's Office, pursuant to the Crime Victims Rights Act, 18 U.S.C. § 3771. By formal motion filed not later than November 12, 2009, Company A may be moving to intervene in this litigation for the limited purpose of seeking entry of a protective order that ensures the preservation of Company A's dignity, privacy, and anonymity. See 18 U.S.C. § 3771.

In the event that the Government and defense counsel agree upon a form of order prior to November 12, 2009, Company A respectfully requests that the Court withhold signing and entering any such order until the victim is afforded its rights to comment to the Government upon the proposed order and, if necessary, move to intervene in this litigation. As a practical matter, Company A will only be moving to intervene if the Government and defense counsel are unwilling to incorporate certain critical provisions into the stipulated protective order that are vital to protecting Company A's rights as a victim. If, on the other hand, Company A's victim concerns are addressed adequately by the proposed order ultimately agreed upon between the Government and defense counsel, I will advise the Court and the Government that this victim has no objection to entry of the parties' stipulated protective order.

Thank you for considering this victim submission and Company A's request that the Court wait until November 13, 2009, before taking any action with respect to entry of a stipulated protective order in this matter.

Respectfully submitted,

s/ Kevin G. Walsh

Kevin G. Walsh
Director

cc: AUSA Erez Liebermann (via ECF)
AFPD Christopher O'Malley (via ECF)